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April 8, 2013

Mrs. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Appellant Name: Richard Senturia, Consultant for the Applicant  
Appellant CRN: 16048902  
Applicant: St. Peter School  
BEN: 11112  
Form 471 #: 523233  
FRN #: 1440709, 1440785

Re: **Request for Review**

USAC Administrator Denials for Invoice Deadline Extension Requests dated 01/28/12 and Later  
CC Docket No. 02-6

Dear Mrs. Dortch:

St. Peter School, BEN 11112, is appealing USAC's denial of invoice deadline extension requests and subsequent appeals for FRNs 1440709 and 1440785 in letters dated March 29, 2013 having the following explanation:

- **Current invoice deadlines and procedures require that Invoice Deadline Extension requests be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring an extension. The invoice receipt deadline is 120 days after the end of the service delivery date or 120 days after the date of the Form 486 Notification Letter whichever is later. USAC rejected your request for Invoice Deadline Extension because the request was not filed in a timely manner. Since USAC's decision was consistent with Invoice Deadline Extension guidelines, your appeal is denied.**

In our original request dated 12/05/12 and subsequent appeal dated 03/21/13 we explained to USAC that the applicant had experienced changes in its key administrative staff which negatively affected its E-Rate management and that these changes resulted in the loss of institutional knowledge of E-Rate rules, regulations, policies, procedures, guidelines and deadlines. As a result, the applicant failed to file timely Billed Entity Applicant Reimbursement (BEAR) forms.

As evidenced on its web-site, USAC's administrative procedures allow for the approval of invoice deadline extensions. The list of "conditions" on USAC's website is not an exhaustive list of the scenarios that support an extension.

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The applicant complied with all other E-Rate program rules for the funding year and has already received services.

We respectfully request approval of our invoice deadline extension requests to allow St. Peter School to recover funds committed it that it has already paid for these services.

Granting this deadline extension request the serves the public interest.

Granting this deadline extension request does not promote waste, fraud or abuse.

For the Applicant,

Richard Senturia, CEO  
eRateProgram, LLC.